



**MILBER MAKRIS PLOUSADIS & SEIDEN, LLP**

ATTORNEYS AT LAW  
709 WESTCHESTER AVE., SUITE 300 WHITE PLAINS, NY 10604  
TELEPHONE: (914) 681-8700 FAX: (914) 681-8709  
HTTP://WWW.MILBERMAKRIS.COM

August 26, 2019

Via ECF

Hon. Jesse M. Furman,  
United States District Judge  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007

Re: *Ada E. Vallanilla-Soto v. 2008 Westchester Owner LLC, Liberty One Group, Liberty One Construction, LLC, U&Z Construction, Inc. and Shah Group Enterprises, Inc.*  
Civil Action No. : 19cv-7466  
Our File No. : 712-17359

---

Dear Justice Furman:

Please be advised that this firm represents defendant, 2008 Westchester Owner LLC, in the above matter.

I am writing to respectfully request an extension of time of the Court-ordered deadline to file an Amended Notice of Removal, per the Court's August 12, 2019 Order. The current deadline is today, August 26, 2019. There have been no previous requests for an extension of time. Counsel for plaintiff has not consented to an extension, as counsel contends that such request is lacking in good faith and is being filed to unnecessarily protract and delay the progression of litigation (a contention with which we, of course, do not agree).

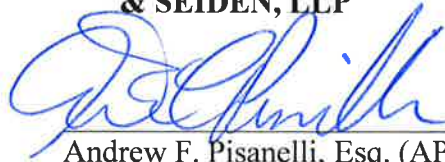
The reason for the request is that we have been working diligently with our client to secure the information required to clarify the existence of diversity jurisdiction. In particular, we are securing documentation evidencing the citizenship of all persons who are members of 2008 Westchester Owner LLC (including documentation evidencing the citizenship of a member that is an LLC). However, due to vacation schedules and religious observances, we have not been successful in securing all of the required information as of this date. The reason for this late request is that as of August 23, 2019, it was believed that we were in receipt of all necessary information in order to prepare and file the Amended Notice of Removal. However, additional information came to light that requires additional time.

Hon. Jesse M. Furman  
August 26, 2019  
Page 2

I await the Court's response to the foregoing and I thank the Court in advance for all courtesies.

Very truly yours,

**MILBER MAKRIS PLOUSADIS  
& SEIDEN, LLP**



Andrew F. Pisanelli, Esq. (AP 8176)

Attorneys for Defendant

**2008 Westchester Owner LLC**

White Plains, New York 10604

(914) 231-8023

File No. 712-17359

[apisanelli@milbermakris.com](mailto:apisanelli@milbermakris.com)

cc: Via ECF  
Anna Higgins, Esq.  
**LINTON ROBINSON & HIGGINS, LLP**  
Attorneys for Plaintiff  
80 Maiden Lane, Suite 1006  
New York, New York 10038  
(212) 601-2771  
File No.: PLN-103  
[AHiggins@litigationattys.com](mailto:AHiggins@litigationattys.com)